

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

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|--|---|--------------------------------|
| GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS | ) | Case Number: 1:22-cv-10904-JSR |
|  | ) |                                |
|  | ) |                                |
| PLAINTIFF,                                     | ) |                                |
|  | ) |                                |
| V.   | ) |                                |
|  | ) |                                |
| JPMORGAN CHASE BANK, N.A.                      | ) |                                |
|  | ) |                                |
| DEFENDANT.                                     | ) |                                |

**MOTION FOR ISSUANCE OF LETTER OF REQUEST  
FOR DOCUMENT PRODUCTION**

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NOW COMES, the Plaintiff, in the above referenced action, and moves for the Issuance of a Letter of Request (Letter Rogatory) pursuant to F.R.C.P. 28 requesting an order requiring Barclays Bank PLC, located at 1 Churchill Place, London E14 5HP, United Kingdom, to produce discovery documents requested by Plaintiff, which are set forth in the Letter of Request for Document Production and Schedule A attached hereto, in digital and/or hard copy form.

As grounds for this Motion, the Plaintiff states the following:

The above captioned case is currently pending in the United States District Court for the Southern District of New York. The Government of the United States Virgin Islands (“Government”) brought this civil action against JPMorgan Chase Bank, N.A. (“JPMorgan”) as part of its ongoing effort to protect public safety and to hold accountable those who facilitated or participated in, directly or indirectly, the trafficking enterprise Jeffrey Epstein (“Epstein”) helmed. The Government’s investigation revealed that JPMorgan knowingly, negligently, and unlawfully provided and pulled the levers through which recruiters and victims were paid and was

indispensable to the operation and concealment of the Epstein trafficking enterprise. Financial institutions can connect—or choke—human trafficking networks, and enforcement actions filed and injunctive relief obtained by attorneys general are essential to ensure that enterprises like Epstein’s cannot flourish in the future.

Former JPMorgan senior executive Jes Staley (“Staley”) developed a close relationship with Epstein when Staley was the head of JPMorgan’s Private Bank. Between 2008 and 2012, Staley exchanged approximately 1,200 emails with Epstein from his JPMorgan email account. These communications show a close personal relationship between the two men, and that Staley nonetheless played a role in JPMorgan’s compliance decisions with respect to Epstein. They also reveal that Staley corresponded with Epstein while Epstein was incarcerated and visited Epstein’s Virgin Islands residence on multiple occasions. Staley left JPMorgan in 2013 and became the Chief Executive Officer of Barclays Bank PLC in 2015 until he resigned in November 2021 after the Financial Conduct Authority began a preliminary investigation into Staley’s relationship with Epstein. It has been publicly reported that Barclays Bank PLC produced documents to the Financial Conduct Authority as part of its investigation into Staley’s relationship with Epstein. These documents are equally applicable to the Government’s case. This evidence will assist the Court in resolving the disputed issues presented in the civil action before it.

WHEREFORE Plaintiff respectfully requests that this Honorable Court allow this Motion and issue a Letter of Request for Document Production. A proposed Letter of Request for Document Production is attached to this Motion as Exhibit 1.

Dated: January 26, 2023

**CAROL THOMAS-JACOBS, ESQ.**  
**ACTING ATTORNEY GENERAL**

/s/Linda Singer  
**LINDA SINGER** (NYS Bar #2473403)

Admitted *Pro Hac Vice*  
Motley Rice LLC  
401 9<sup>th</sup> Street NW, Suite 630  
Washington, DC 20004  
Tel: (202) 232-5504  
lsinger@motleyrice.com

**CAROL THOMAS-JACOBS** (NYS Bar #2941300)  
Admitted *Pro Hac Vice*  
Acting Attorney General of the United States  
Virgin Islands  
Virgin Islands Department of Justice  
34-38 Kronprindsens Gade  
St. Thomas, U.S. Virgin Islands 00802  
Tel.: (340) 774-5666 ext. 10101  
carol.jacobs@doj.vi.gov

**DAVID I. ACKERMAN** (NYS Bar #4110839)  
Motley Rice LLC  
401 9<sup>th</sup> Street NW, Suite 630  
Washington, DC 20004  
Tel: (202) 849-4962  
dackerman@motleyrice.com

**PAIGE BOGGS**  
Admitted *Pro Hac Vice*  
Motley Rice LLC  
401 9<sup>th</sup> Street NW, Suite 630  
Washington, DC 20004  
Tel: (202) 386-9629  
pboggs@motleyrice.com

**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2023, the foregoing Plaintiff's Motion for Issuance of Letter of Request for Document Production was filed with the Clerk's Office using the CM/ECF system. Notice of this filing will be sent to all parties of record by operation of, and parties may access this filing through, the Court's CM/ECF system.

/s/Linda Singer  
Linda Singer